

1 Honorable Christopher M. Alston
2 Hearing Date: October 18, 2019
3 Hearing Time: 9:30 a.m.
4 Location: Seattle
5 Chapter 11

6
7 UNITED STATES BANKRUPTCY COURT
8 WESTERN DISTRICT OF WASHINGTON
9

10 In re

11 NORTHWEST TERRITORIAL MINT LLC,
12 Debtor.

13 No. 16-11767
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15 SUPPLEMENTAL RESPONSE IN
16 SUPPORT OF NORTHWEST
17 TERRITORIAL MINT LLC'S MOTION TO
18 APPROVE SETTLEMENT WITH
19 BRADLEY STEPHEN COHEN AND
20 COHEN ASSET MANAGEMENT AND
21 KATHRYN A. ELLIS AND TO
22 AUTHORIZE SALE OF SEIZED
23 PROPERTY

24 COMES NOW Kathryn A. Ellis, the Chapter 7 Trustee of the bankruptcy estate of Diane
25 Erdmann, Bk. No. 19-41238, by and through the undersigned attorney, and submits the attached
26 Declaration of Trustee (Exhibit 1) and Declaration of Christopher G. Williams (Exhibit 2) that
27 have been filed in the Erdmann estate (Bk. No. 19-41238, Docket Nos. 85 and 86, respectively)
28 in supplement to the Response in support of Northwest Territorial Mint LLC's Motion to
Approve Settlement with Bradley Stephen Cohen and Cohen Asset Management and Kathryn A.
Ellis and to Authorize Sale of Seized Property (Docket No. 2131).

DATED this 17th day of October, 2019.

26 /s/ Kathryn A. Ellis
27 Kathryn A. Ellis, WSBA #14333
28 Attorney for Trustee

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SUPPLEMENTAL RESPONSE IN SUPPORT OF NORTHWEST TERRITORIAL MINT LLC'S MOTION TO APPROVE SETTLEMENT WITH BRADLEY STEPHEN COHEN AND COHEN ASSET MANAGEMENT AND KATHRYN A. ELLIS AND TO AUTHORIZE SALE OF SEIZED PROPERTY - 1

KATHRYN A. ELLIS PLLC
5506 6th Ave S
Suite 207
Seattle, WA 98108
(206) 682-5002

EXHIBIT 1

1 Honorable Mary Jo Heston
2 Hearing Date: October 22, 2019
3 Hearing Time: 9:00 a.m.
4 Response Date: October 15, 2019
5 Location: Tacoma
6 Chapter 7

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8 UNITED STATES BANKRUPTCY COURT
9 WESTERN DISTRICT OF WASHINGTON

10 In re

11 DIANE ERDMANN,

12 Debtor.

No. 19-41238

13 DECLARATION OF TRUSTEE IN
14 SUPPORT OF REPLY TO OBJECTIONS
15 OF ERDMANN AND PEHL TO MOTION
16 TO APPROVE SETTLEMENT AND SALE
17 OF ESTATE'S INTEREST IN COIN AND
18 METAL INVENTORY

19 Kathryn A. Ellis declares and states as follows:

20 1. I am the Trustee in this matter and have testimonial knowledge of the facts set
21 forth in this declaration.

22 2. After buyer Bellevue Rare Coins was located, I drafted a solicitation letter
23 directed to businesses in the coin and precious metal buying trades. The highest and best offer I
24 have received is from American Rarities Rare Coin Company in the amount of \$147,000. This
25 offer is not subject to the buyer's inspection of the inventory. Presently, I am circulating that
offer to the other potentially interested buyers, including the proposed buyer in the motion,

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28 //

29 DECLARATION OF TRUSTEE IN SUPPORT OF REPLY
30 TO OBJECTIONS OF ERDMANN AND PEHL TO
31 MOTION TO APPROVE SETTLEMENT AND SALE OF
32 ESTATE'S INTEREST IN COIN AND METAL INVENTORY - 1

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1 Bellevue Rare Coin, to determine whether any higher bids or offers will be made up to or at the
2 time of the hearing.

3 I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.
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5 Dated this 17th day of October, 2019 at Seattle, Washington.
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7 By: /s/ Kathryn A. Ellis
Kathryn A. Ellis

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**DECLARATION OF TRUSTEE IN SUPPORT OF REPLY
TO OBJECTIONS OF ERDMANN AND PEHL TO
MOTION TO APPROVE SETTLEMENT AND SALE OF
ESTATE'S INTEREST IN COIN AND METAL INVENTORY - 2**

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EXHIBIT 2

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Honorable Mary Jo Heston
Hearing Date: October 22, 2019
Hearing Time: 9:00 a.m.
Response Date: October 15, 2019
Location: Tacoma
Chapter 7

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re:

DIANE ERDMANN,

Debtor.

No. 19-41238

DECLARATION OF CHRISTOPHER G.
WILLIAMS IN SUPPORT OF REPLY TO
OBJECTIONS OF ERDMANN AND PEHL
TO MOTION TO APPROVE SETTLEMENT
AND SALE OF ESTATE'S INTEREST IN
COIN AND METAL INVENTORY

Christopher G. Williams, declares and states as follows:

1. I am the assistant to the Trustee herein, have testimonial knowledge of the facts set forth in this declaration and competent to testify thereto.

2. The Trustee drafted a solicitation letter and directed me to send that to businesses in the coin and precious metal buying trades. I conducted an online investigation for possible business and, where email addresses or fax numbers were not posted on their websites, called such businesses to obtain their contact information. Attached hereto as Exhibit 1 is my tracking list of to whom, when, and how the Trustee's letter was sent, together with the parties' responses as they have been received, if any to date.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Dated this 16th day of October, 2019 at Seattle, Washington.

By: /s/ Christopher G. Williams

Christopher G. Williams

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**DECLARATION OF CHRISTOPHER G. WILLIAMS IN
SUPPORT OF REPLY TO OBJECTIONS OF ERDMANN AND
PEHL TO MOTION TO APPROVE SETTLEMENT AND SALE OF
ESTATE'S INTEREST IN COIN AND METAL INVENTORY - 1**

KATHRYN A. ELLIS PLLC
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EXHIBIT 1

Sent 10/4/2019

Renton Coin Shop Inc.	Email
Northgate Rare Coins & Precious Metals	Email
The Gold Center Inc.	Email
Sound Gold Buyers	Email
The Coin Market LLC	Email
Redmond Rare Coins	Email (2 addresses)
American Rarities Rare Coin Company	Email
Cash for Gold	Email
Market Coins & Collectibles	Email
Pacific Iron & Metal	Facsimile

Sent 10/7/2019

Seattle Coin Shop	Email
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Sent 10/11/2019

Coin & Stamp Shop	Email
LJR Coins	Email
Tacoma Mall Blvd Coin & Stamp	Email
Pinnacle Rarities	Email
B&I Coin Shop	not interested (but referred me to American Coin & Vault)
American Coin & Vault	Email

Sound Gold Buyers	10/5/19 email saying no thank you.
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Renton Coin Shop Inc.	10/4 VM - interested in bidding
American Rarities Rare Coin Company	10/15 email - \$135,235 bid; requests inspection
	10/4 T/C - will send offer 10/7/19
	10/10 email - \$147,500 bid
Redmond Rare Coins	10/7 T/C - will send soft bid, subject to inspection
	10/8 email - \$130,000 bid; requests inspection
Pacific Iron & Metal	10/9 T/C - will send email confirming interest, but will require inspection first
	10/10 email - notice of interest; requests inspection
Seattle Coin Shop	10/10 email - notice of interest; requests inspection
Coin & Stamp Shop	10/11 email - notice of interest
LJR Coins	10/15 email (2) - notice of interest
	10/15 email - \$128,300 bid